

EXHIBIT X

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**DECLARATION OF CHARLES S. ZIMMERMAN IN SUPPORT OF CO-LEAD CLASS
COUNSEL'S PETITION FOR AN AWARD OF ATTORNEY'S FEES AND
REIMBURSEMENT OF COSTS AND EXPENSES**

Charles S. Zimmerman declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Zimmerman Reed LLP. I submit this declaration in support of Co-Lead Class Counsel's Petition for an Award of Attorney's Fees and Reimbursement of Costs and Expenses in connection with and for services rendered and expenses incurred for the common benefit of the Settlement Class in the above-captioned multidistrict litigation ("Action") from the inception of the litigation through July 15, 2016. I

have personal knowledge of the matters set forth in this declaration and, if called upon, I could and would testify competently thereto.

2. I am a member of the Plaintiffs' Steering Committee in this matter. My law firm was one of the founding members of the NFL Concussion Litigation. We currently represent over 400 retired NFL players. Our investigation of the factual and legal claims in this action started in early 2010, when several retired NFL players we were representing in the publicity rights case *Dryer, et al v. National Football League*, began detailing to us the neurological difficulties they were experiencing and asking questions about the blows to the head they suffered while active players. A pattern began to emerge and we decided to further investigate the NFL's potential liability to our clients.

The issues described to us by our NFL clients in 2010 had particular significance to my firm. A former law partner at our firm, retired NFL player Fred McNeill, exhibited similar symptoms. Fred was a trusted partner and good friend, but we could not understand his declining cognitive performance. When we reached out to the many hundreds of our then-clients who were retired NFL football players, the response was overwhelming. Nearly all of our clients reported some symptoms of neurological illness and a desire to participate in seeking a remedy against the NFL.

Our initial investigation of potential claims against the NFL involved several conferences with Dr. Bennet Omalu and other key figures in the science of NFL head injuries. These meetings occurred before the commencement of any litigation and these coordinated proceedings. By mid-2011, we decided to fully pursue the matter. We filed our first complaint in December 2011, and filed numerous subsequent complaints on behalf of retired NFL players.

With several law firms filing related complaints, we convened and participated in the first organizational meeting of counsel in this matter with the Hausfeld and Anapol Weiss firms, at Hausfeld's Washington DC offices on December 5, 2011. There, we discussed and decided upon our desire to advocate for MDL status of the action in the Eastern District of Pennsylvania before the Hon. Anita B. Brody. Those efforts ultimately came to fruition upon the ruling of the Judicial Panel on Multidistrict Litigation, which created this MDL.

After the formation of the MDL, I sought and was appointed to the Plaintiffs' Steering Committee. My firm and I worked at the request of Lead Counsel on a variety of matters, including researching and drafting memoranda regarding the NFL's preemption defense, meeting with experts regarding a medical monitoring protocol, participating in leadership strategy meetings and activities, coordinating the participation of players for public relations and other efforts, providing information necessary for settlement efforts, and, perhaps most significantly, chairing a subcommittee on class member representation and ethics issues. In this role with the ethics subcommittee, my firm helped to retain a consulting ethics expert on behalf of the MDL, Professor John Burkoff, and coordinated the efforts to address class member confusion and ethical issues created by misleading advertising campaigns aimed at NFL retired players. We worked with lead counsel and many other MDL counsel, the Garretson group, and Settlement Administrator BrownGreer to address issues surrounding class member confusion and ethics.

My firm and I also worked extensively with our clients and other leadership counsel to gain support and approval of the Settlement in this matter at each step. We will continue this work to support implementation of the Settlement for the benefit of all retired players, including our hundreds of clients.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of common benefit time spent by the attorneys and professional support staff of my firm who were involved in, and billed fifty or more hours to, this Action, and the lodestar calculation for those individuals based on my firm's current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based on the billing rates of such personnel in their final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm. Time expended in preparing this application for attorney's fees and expenses has been excluded.

4. The hourly rates for the attorneys and professional support staff of my firm included in Exhibit 1 are the same as they charge for non-contingent work that is paid on an hourly basis, or for rates paid to attorneys of comparable experience and reputation in the relevant legal market.

5. The total number of hours expended on the common benefit of this Action by my firm during the time period is 1,106.50 hours. The total lodestar for my firm for those hours is \$885,907.25, consisting of \$870,727.25 for attorneys' time and \$15,180.00 for professional support staff time.

6. My firm's lodestar figures are based solely upon my firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

7. As detailed in Exhibit 2 hereto, my firm is seeking reimbursement of a total of \$135,545.72 in common benefit expenses incurred in connection with the prosecution of this Action. These expenses are reflected on the books and records of my firm. These books and

records are prepared from expense vouchers, check records, and other source material, and are an accurate record of the expenses incurred.

8. With respect to the standing of my firm to share in an award of fees, costs, and expenses, attached hereto as Exhibit 3 is a biography of my firm, including the attorneys in my firm who were principally involved in this Action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2017, at Minneapolis, Minnesota.

s/ Charles S. Zimmerman
Charles S. Zimmerman

EXHIBIT 1

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

ZIMMERMAN REED LLP

LODESTAR REPORT

Inception through July 15, 2016

NAME	HOURS	HOURLY RATE	AMOUNT
PARTNERS:			
Charles S. Zimmerman	580.75	\$900	\$522,675.00
J. Gordon Rudd, Jr.	210.20	\$795	\$167,109.00
David M. Cialkowski	95.30	\$695	\$66,233.50
Brian C. Gudmundson	165.05	\$695	\$114,709.75
PARALEGALS:			
Tina M. Olson	55.20	\$275	\$15,180.00
TOTALS:	1106.50		\$885,907.25

EXHIBIT 2

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

ZIMMERMAN REED LLP

COST AND EXPENSE REPORT

Inception through July 15, 2016

NUMBER	CATEGORY	AMOUNT
1	Assessments	\$100,000.00
2	Commercial Copies	
3	Computerized Research	\$652.30
4	Court Reporters/Transcripts	
5	Expert Services	\$1887.50
6	Facsimile	
7	Filing & Service Fees	
8	In-House Copies	\$1127.80
9	Long Distance Telephone	\$347.46
10	Postage/Express Delivery	\$1,473.44
11	Travel/Meals/Lodging	\$30,024.83
12	Miscellaneous	\$32.39
TOTAL EXPENSES		\$135,545.72

EXHIBIT 3

ZIMMERMAN | REED

— FIRM RESUME

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FIRM PRACTICE AND ACHIEVEMENTS

Zimmerman Reed is a nationally recognized leader in complex and class action litigation and has been appointed as lead counsel in some of the largest and most complex cases in federal and state courts across the country. The firm was founded in 1983 and has successfully represented thousands of consumers and injured individuals nationwide in significant and demanding cases. The firm's practice includes a wide range of legal issues and complex cases involving consumer fraud, ERISA, shareholder actions, environmental torts, pharmaceutical drugs, dangerous or defective products, human rights violations, and privacy litigation. Since 2010, Zimmerman Reed has earned a first-tier "Best Law Firm" ranking released by U.S. News & World Report.

ZIMMERMAN REED ATTORNEYS

Carolyn G. Anderson is a Managing Partner at Zimmerman Reed and leads the firm's Securities & Financial Fraud, Antitrust, and Public & Attorney General practice groups.

Carolyn has successfully represented small investors, institutional clients, and states in individual and nationwide securities fraud, ERISA, and antitrust actions. She has served in a leadership role in obtaining significant recoveries in both individual actions and multi-state actions.

Carolyn is currently serving as Lead Counsel in a case representing the State of New Mexico. In that case, the State is alleging antitrust and unfair practices against Visa and MasterCard. Carolyn also served as Lead Counsel in an antitrust action, working with a coalition of four Attorneys General, against manufacturers of LCD displays. The case was filed in state court but removed to federal court under the Class Action Fairness Act (CAFA). After opposing this removal at the district court and the Fifth Circuit, the State petitioned the U.S. Supreme Court. The Supreme Court ruled unanimously in favor of Mississippi, reversing the Fifth Circuit's decision and clarifying the standard for removal of state actions under CAFA. *Mississippi ex rel. Hood v. AU Optronics*, 134 S. Ct. 736 (2014).

Carolyn also represents the Office of Attorney General for the State of Mississippi, defending that Office in an action brought by Google, challenging the State's authority to issue a Civil Investigative Demand (CID). Google attempted to enjoin the Attorney General's CID authority and the district court granted that motion. In April, 2016, the State prevailed and the district court's decision was reversed by the Fifth Circuit.

Carolyn was also appointed Co-Lead Counsel on behalf of investors alleging losses due to Wells Fargo's securities lending program. The case settled for \$62 million, two days before trial was set to commence. She serves as Interim Co-Lead Counsel in an ERISA matter pending in the District of Minnesota, against fiduciaries of U.S. Bancorp Pension Plan for violations of ERISA. Carolyn also served as Class Counsel on behalf of investors who had purchased bond funds from Morgan Keegan in a lawsuit that arose from the collapse of three mutual funds. The case also involved the auditor as a defendant. In 2016, a \$125 million settlement was reached with the assistance of mediator Layn Phillips, a former U.S. Attorney and former United States District Judge.

In prior representation, Carolyn represented large groups of investors with significant losses involving Merrill Lynch, AIG, Boston Scientific, and Lehman Brothers. Carolyn also led a legal team in a case brought by investors against American Express Financial Advisors, challenging that company's practices and breaches of fiduciary duty with its investing customers. The case, brought under the Investment Advisor Act, resulted in a \$100 million settlement. Carolyn also successfully represented Midwest farmers/shareholders who challenged an ethanol plant's merger with Archer Daniels Midland; she was appointed Class Counsel in that matter. The case was resolved weeks prior to trial. Carolyn was also appointed Lead Counsel in a securities fraud lawsuit involving Boston Scientific, representing a public pension fund and a certified class.

In addition to serving in positions of leadership in investor protection litigation, Carolyn currently represents *pro bono* one hundred not-for-profit organizations related to their losses from the \$3.6 billion Petters Ponzi scheme, centered in Minnesota. She was appointed by the federal judge to serve as Assistant Liquidating Trustee under the supervision of the Court and the Liquidating Trustee for assets being distributed to some of those investors. In *U.S. v. Petters*, No. 08-cv-05348 (D. Minn.), the Firm worked with the Department of Justice and the court-appointed receiver, to successfully recover and distribute millions of dollars to victims pursuant to a settlement with one of the Petters financiers.

Carolyn maintains strong ties with the National Association of Attorneys General, individual state Attorneys General, state pension fund officers, and other institutional investors. She is a frequent lecturer at colleges and law schools, and has served as a legal education faculty member on the topics of complex litigation, legal ethics, the 2008 financial crisis, and securities law.

Carolyn currently serves as a board member and Chairperson for Children's Shelter of Cebu, an interdenominational ministry for abandoned and neglected children. She also serves as a board member with Bloomberg Law on its Litigation Innovation Board.

Carolyn graduated cum laude from Trinity College, where she received a Bachelor of Arts degree in Psychology. She received her law degree cum laude from Hamline University School of Law where she was a Dean's Scholar, received the Cali Award for Excellence in Constitutional Law, and served on Hamline Law Review, where her case note article was selected for publication. Carolyn also studied law at Hebrew University in Jerusalem, Israel in course-work focusing on Law, Religion, & Ethics. Carolyn was previously honored as Rising Star of Law and, in 2014, 2015, and 2016, she was recognized as a Super Lawyer by her peers in Minnesota.

Carolyn is admitted to practice before, and is a member in good standing of, the Bar of the State of Minnesota, the United States District Court for the District of Minnesota, the Court of Appeals for the Eighth Circuit and the First Circuit, and the U.S. Supreme Court. In addition to these courts, Carolyn works on cases with local counsel nationwide. She is a member of the Federal Bar Association, the American Association for Justice, the Minnesota Bar Association, and the Hennepin County Bar Association.

Hannah P. Belknap is an associate with Zimmerman Reed, working in the firm's Los Angeles, California office. Hannah focuses her practice on consumer class actions and complex litigation, including the areas of Consumer Protection and Employee Rights & Overtime. She currently represents consumers who allege Maxim Healthcare Services violated their rights under the federal Fair Credit Reporting Act by unlawfully procuring consumer reports as part of their employment application, as well as Maxim employees who were not paid minimum wages for all of the services they provided. Hannah is part of a team of lawyers representing consumers who allege Hain Celestial Seasonings falsely advertises its teas as 100% Natural, when they actually contain pesticides and other carcinogens. She also represents mortgage borrowers who were charged unlawful kickbacks through a nationwide force-placed homeowner's insurance scheme.

Hannah is a graduate of the University of the Pacific, McGeorge School of Law where she earned her JD with a Business Law Concentration. She was the recipient of the Witkin Award for Academic Excellence for Legal Research and Writing and attended her law school's Salzburg, Austria Summer Program taught by Supreme Court Associate Justice Anthony M. Kennedy. In 2012, Hannah was a summer intern in Washington D.C. working in the Office of the General Counsel of the Commodity Futures Trading Commission (CFTC). Prior to law school, Hannah attended the University of California, Santa Barbara, earning her Bachelor of Arts degree in Philosophy and Law and Society. Hannah is licensed to practice law in California.

David M. Cialkowski is a partner with Zimmerman Reed, and dedicates a substantial portion of his practice to the area of complex and mass tort litigation, with a primary focus on consumer protection and products liability litigation.

David was a member of the legal team that represented the Mississippi Attorney General's Office in Mississippi ex rel. Hood v. AU Optronics, 134 S. Ct. 736 (2014), an antitrust case against manufacturers of LCD displays in which the Court held that an attorney general's parens patriae case is not a "mass action" under the Class Action Fairness Act. The Supreme Court ruled unanimously in Mississippi's favor. He served as a member of the Plaintiffs' Steering Committee in In re Apple iPhone 3G and 3GS "MMS" Marketing and Sales Practices Litigation, a consumer protection class action, MDL 2116, based in New Orleans, Louisiana. He worked extensively on the Levaquin MDL trial team on behalf of clients who experienced tendon ruptures and tears after taking the popular Johnson & Johnson antibiotic. He also served as court-appointed co-lead counsel in In re Dockers Roundtrip Airfare Promotion Sales Practices Litigation, a consumer protection class action based in the U.S. District Court for the Central District of California. David has worked extensively on behalf of plaintiffs in In re St. Jude Silzone Heart Valves Product Liability Litigation, MDL 1396. He has also contributed substantially to pretrial summary judgment and class certification briefing in the Fedex Ground Package Systems employment status litigation, MDL 1700. David represented residents of Minot, North Dakota, in In re Soo Line Railroad Company Derailment of January 18, 2002 in Minot, N.D., who were injured by the toxic spill caused by the derailment of a Canadian Pacific Railway train, and helped draft federal legislation clarifying the scope, and thus reducing courts' application, of railroad preemption.

David earned his undergraduate degree from the University of Illinois's College of Liberal Arts and Sciences *cum laude* with High Distinction in the Department of English. Additionally, he participated in the honors program as a James Scholar, received the Elizabeth and Charles Ellis Merit Scholarship, and is a member of Phi Beta Kappa. David graduated from the University of Illinois College of Law, where he participated in the civil litigation clinic, was an editor for the Poetic Justice literary magazine, and was voted one of the top ten percent of university teaching assistants.

David is licensed to practice and a member in good standing, for the Bars of the State of Minnesota and the State of Illinois. His professional associations include membership in the Minnesota State Bar Association and Hennepin County Bar Association. David has been recognized as a Rising Star of Law from 2006–2008, 2010–2013 and 2015.

Brian C. Gudmundson is a partner and concentrates his practice on complex litigation and commercial class actions, including the areas of Consumer, Antitrust, Securities & Financial Fraud, Intellectual Property, and Sports Law. Brian represents individuals, businesses, and public and private institutional clients in a variety of complex cases.

Brian is a member of Plaintiffs Executive Committee in *In Re General Mills Glyphosate Litigation*, Case No. 16-cv-2869-MJD-BRT, asserting deceptive sales practices based upon alleged presence of glyphosate in products labeled “100% natural” and in *Vikram Bhatia, D.D.S. v. 3M Company*, 16-cv-01304-DWF-TNL, asserting claims on behalf of dentists and dental practices for allegedly defective dental crown products. Brian is a member of the plaintiffs steering committee in *In re: Vizio, Inc. Consumer Privacy Litigation*, MDL 2693, asserting violations of state and federal law for unlawful collection and sale of private consumer data. He is co-lead counsel in *GLS Companies, et al. v. Minnesota Timberwolves Basketball LP*, challenging implementation of paperless ticketing system and restrictions on transfer of game tickets on behalf of ticketholders. Brian is also a member of the plaintiffs steering committee in the Home Depot Data Breach MDL 2583 representing banks and credit unions in recovering losses. Brian represents retired NHL players alleging the National Hockey League minimized concussion risks from its players for decades. Brian is a member of the lead counsel team that achieved a \$39 million settlement on behalf of banks and other financial institutions in recovering losses due to the 2013 Target data breach. He is also a member of the lead counsel team that achieved a \$50 million settlement on behalf of retired National Football League players in a class action against the League for the unauthorized use of former players' identities to generate revenue. He represents hundreds of individual retired NFL players in claims arising from concussive head injuries suffered while NFL players. Presently, Brian represents MoneyGram Payment Systems, Inc. in claims against several Wall Street banks alleging over \$400 million of losses due to the fraudulent sale of securities containing undisclosed, toxic mortgage-based assets. He also specializes in claims under the RICO Act and currently represents multiple non-profit and faith-based investors pro bono in RICO claims arising from the \$3.5 billion Petters Ponzi scheme.

Brian served as court-appointed co-lead counsel in *In Re: Dockers Roundtrip Airfare Promotion Sales Practices Litigation* (C.D. Cal.), which culminated in a multimillion dollar settlement on behalf of a nationwide class of consumers. In 2005, Brian was part of a securities litigation team that achieved a \$2.5 billion settlement against AOL-Time Warner on behalf of investors.

Brian received his BA from the University of Minnesota and his JD, *cum laude*, from the University of Minnesota Law School. Brian is admitted to the state courts of Minnesota, the U.S. District Courts for the District of Minnesota and the Northern District of Illinois, and the Tenth Circuit Court of Appeals. Brian has been recognized as a Rising Star of Law every year since 2010.

June P. Hoidal is an partner representing individuals and businesses who experienced losses as a result of securities and consumer fraud and antitrust violations. She is a member of the legal team representing the State of Mississippi in an antitrust action against manufacturers of LCD screens. Her work included assisting with briefing before the U.S. Supreme Court, which unanimously ruled in favor of Mississippi by finding the State's *parens patriae* action was not removable to federal court. *Mississippi ex rel. Hood v. AU Optronics*, 134 S. Ct. 736 (2014). June also represented investors alleging losses due to Wells Fargo's securities lending program, a case that settled two days before trial was set to commence for \$62 million. She currently represents the State of New Mexico in a matter against Visa and MasterCard, alleging antitrust and unfair practices; participants of the U.S. Bancorp Pension Plan alleging violations of ERISA; and investors of Medtronic in a shareholder derivative case.

Prior to joining the firm, June served as a judicial law clerk to the Honorable Arthur J. Boylan on the United States District Court for the District of Minnesota. She gained substantial experience following law school at two law firms in Washington, D.C. and Minneapolis, practicing in diverse subject areas, including contract disputes, franchise, products liability, insurance, and employment law.

June currently serves as a board member and as the lead co-chair of the Associates Campaign for The Fund for Legal Aid. She also currently serves as a member of the Advisory Board for the Minnesota Urban Debate League and the Publications Committee for the Bench & Bar of Minnesota. Previously, she served as a Commissioner for the City of Saint Anthony Parks Commission, and a member of the Diversity Committee and the Women in the Legal Profession Committee of the Minnesota State Bar Association. In addition, June volunteered as an assistant debate coach for the Minnesota Urban Debate League and worked pro bono for Legal Assistance of Dakota County, Volunteer Lawyers Network, and The Advocates for Human Rights.

June graduated cum laude from the University of Minnesota Law School in 2003, where she was the Lead Managing Editor for the Minnesota Law Review and a member of the Dean's List. She is admitted to the state courts of Minnesota and the U.S. District Courts for the District of Minnesota. June has been recognized as a Rising Star of Law in 2007, 2015, and 2016.

Jason P. Johnston is a partner at our Minneapolis office, focusing primarily on complex cases involving individuals injured by defective drugs and faulty medical devices, advocating for clients both locally and nationally. Jason's personal engagement, resolute view of the law, and solid practice style make him a strong voice for his clients and an integral part of our firm.

Jason represents clients injured from defective orthopedic hip devices manufactured by DePuy, Biomet, Stryker and Smith & Nephew. In the Stryker litigation, Jason helps patients who experienced serious health complications as a result of a modular hip that was recalled from the

market, and was part of the team that first moved the Judicial Panel on Multidistrict Litigation (JPML) to consolidate all Stryker hip claims in the District of Minnesota. During the Biomet M2a hip litigation, Jason was a member of the Plaintiffs' Science Committee where he reviewed technical documents and participated in depositions involving the design and development of the hip implant systems. Jason also represents clients injured by other orthopedic medical devices, including knee replacement systems manufactured by Zimmer. In the Zimmer NexGen knee litigation, Jason serves as a member of the Plaintiffs' Steering Committee and has also taken depositions of key witnesses in addition to working closely with experts.

Jason's medical device litigation experience extends beyond orthopedic devices, including, actively pursuing litigation for clients injured by St. Jude's Riata heart defibrillator leads and he is a member of the Claims Review Committee following a mass settlement involving Medtronic's Sprint Fidelis heart defibrillator leads. He also represents plaintiffs injured by various pharmaceutical drugs, including, Avandia, and Aredia/Zometa. Currently, Jason represents clients who have suffered cardiovascular injuries after taking testosterone therapy supplements, such as Androgel.

He recently accepted a case from the District of Minnesota's Federal Pro Se Project, a program that provides pro se plaintiffs with volunteer counsel to improve access to justice in the Federal Courts, ultimately securing a settlement against the plaintiff's employer for racial discrimination allegations. Jason had previous experience in civil rights litigation when he assisted clients in recovering almost \$1 million in a class action litigation involving various constitutional and civil rights violations.

A graduate of the University of St. Thomas School of Law, he was recognized by the Minnesota Justice Foundation for his pro bono service work and also received a Dean's Award in both Adoption and Consumer Law. He maintains close ties with the University of St. Thomas School of Law as a participant in their mentor program, where he is paired with a law student each year to act as a resource in navigating the legal field. Prior to law school, Jason attended Winona State University earning his Bachelor of Science degree, magna cum laude, in Marketing. Since 2014, Jason has been recognized as a Rising Star of Law.

Jason is admitted to the state courts of Minnesota and U.S. District Court for the District of Minnesota.

Andre S. LaBerge brings over twenty years of professional experience – as an attorney and as a business executive – in his advocacy for the rights of investors and consumers, providing counsel to several of the firm's practice areas. He has represented participants in Wells Fargo's securities lending program, investors with losses in Morgan Keegan open end bond funds, and the Office of Attorney General in the LCD antitrust litigation.

Andre has practiced law in Chicago and Minneapolis, and has represented clients at all court levels and in various regulatory forums. He has also served as Vice President, Chief Compliance Officer, General Counsel, and FINRA Registered Principal and Designated Supervisor in the financial services industry with companies that supervised and supported large numbers of securities brokers, financial planners, and insurance agents.

Andre is a graduate of DePaul University College of Law, where he was a Senior Editor for the Journal of Health and Hospital Law, and worked as a Mansfield Foundation Fellowship intern at Southern Minnesota Regional Legal Services. He is a member of the Minnesota State Bar Association and the Hennepin County Bar Association.

Michael J. Laird is an Associate at Zimmerman Reed focusing on the areas of sports law and consumer fraud. He currently supports the firm's efforts in representing retired NHL & NFL players in separate lawsuits alleging that the chronic cumulative effects of concussions were minimized.

A magna cum laude graduate of the University of Minnesota Law School, Michael served as a member of the Journal of Law, Science & Technology, and a member of the American Bar Association Moot Court team. While in law school, Michael also started a medical-legal partnership with the Phillips Neighborhood Clinic to identify and resolve legal issues affecting patient care and well-being in under-served communities, as a member of the Community Practice and Policy Development Clinic.

While in law school, Michael externed for the Honorable Jeffrey J. Keyes of the United States District Court for the District of Minnesota. He also was a law clerk for both the Bad River Band of Chippewa Indians Natural Resources Department and the Minnesota Pollution Control Agency. Michael is licensed to practice law in Minnesota.

Alyssa J. Leary focuses her practice on environmental and consumer protection law. She currently represents corn farmers and exporters in our Syngenta litigation after they suffered economic harm from using the Syngenta's unapproved, genetically modified corn strain. In consumer protection litigation, she is representing RV owners who have defective Dometic refrigerators. Alyssa is also part of the team representing consumers alleging Pacquiao and his promoters kept his shoulder injury secret prior to the highly publicized Pacquiao-Mayweather Pay-Per-View fight.

Alyssa graduated magna cum laude and Order of the Coif from Tulane University Law School and holds a Certificate in Environmental Law. While at Tulane, she worked as an editor for the Tulane Law Review, and studied economic and environmental issues in Brazil.

In addition to her law degree, Alyssa holds a Master of Science in Resource Conservation and a Certificate in Natural Resource Conflict Resolution from the University of Montana. She obtained a Bachelor of Science degree in Biology/Natural Science from the University of Puget Sound.

Prior to joining Zimmerman Reed, Alyssa worked as a renewable energy and construction law attorney and interned at the U.S. Attorney's Office for the Eastern District of Louisiana, the U.S. Marshals Service Office of General Counsel in Washington D.C., and also for the Cottonwood Environmental Law Center in Bozeman, Montana. Alyssa is licensed to practice law in Minnesota and Texas.

Caleb LH Marker is a partner in the firm's Los Angeles office and has dedicated a significant portion of his practice to consumer protection and employment cases, including retail

consumers, misclassified employees, mortgage borrowers, student loan borrowers, farmers, data privacy victims, and nursing home patients.

Caleb is a creative litigator who has been a leader in the consumer protection area and has actively involved as class counsel in cases that have provided meaningful recoveries, through trial or settlement. He currently represents musicians and entertainers in Internet-related copyright and royalty disputes, consumers in a variety of false advertising actions, corn farmers and exporters whose crops lost value as a result of unapproved GMO corn contamination (In re: Syngenta AG MIR162 Corn Litigation, MDL 2591), mortgage borrowers who were charged unlawful kickbacks through a nationwide force-placed homeowner's insurance scheme, and patients who are prescribed Enbrel.

Caleb's relationship with Zimmerman Reed began his first year as a lawyer in Michigan, when the firm served as co-counsel in his very first lawsuit. Years later, that lawsuit resulted in the largest settlement in Michigan that year. In recent years, Caleb's successes include leading a class action against the City of Los Angeles and Xerox that drew widespread media attention, winning a trial that now requires the City to end its decades-long outsourcing of the City's parking violations bureau in a case that will help over a hundred thousand motorists in Los Angeles over the next few years. He was also counsel on a case that achieved an \$11.5 million settlement on behalf of student loan borrowers against the Michigan Treasury Department – securing approval of the first class action settlement in that state's new court of claims. Caleb has also led high-profile class action lawsuits that have changed industries and resulted in significant awards, including a \$24.2 million in settlements in a series of cases for employees who were misclassified and a multi-million dollar award for nursing home patients who were inadequately cared for due to nurse understaffing.

Caleb is admitted to the State Bar of California, the District of Columbia Bar Association (inactive), the State Bar of Michigan, numerous federal district courts across the country, and the U.S. Court of Appeals for the Ninth Circuit. He has briefed and argued appeals in California, Michigan, and the Ninth Circuit. He is a member of the Los Angeles County Bar Association, the Federal Bar Association, and Consumer Attorneys of California.

He also serves on the Los Angeles County Bar's Access to Justice Committee, which aims to maximize the delivery of legal services to the poor and encourage attorneys to provide free legal services to those in need. Several of Caleb's successes have been recognized as a "Top Settlement & Verdict" by the Los Angeles Daily Journal and Michigan Lawyers Weekly. He has been interviewed by numerous media outlets, including NBC, Fox Business, NPR, *The Wall Street Journal*, AP, the *Los Angeles Times*, *LA Weekly*, and Law360. He has also been recognized as a 2015 Rising Star of Law in Southern California by Super Lawyers after a peer-nomination and review process.

Jacqueline A. Olson is an associate representing clients injured by pharmaceutical drugs and recalled or defective medical devices on cases including Mirena IUD, Stryker Hip Replacements, and Transvaginal Mesh implants. Prior to joining the firm, she worked in almost every department of a law firm - from paralegal, to marketing, to law clerk, to lawyer. During this time, she gained valuable insight about the inner workings of a firm giving her a unique and compassionate perspective in advocating for her clients.

A graduate of Hamline University School of Law, Jacqueline served as the Associate and Primary Editor of the Hamline Journal of Public Law & Policy and also served as an intern assisting law clerks to the Honorable Richard H. Kyle. Her academic honors include the Dean's Honor Roll, and a CALI Award in Commercial Law, Sales and, Leases of Goods. She was the recipient of the Best Brief Award in Legal Research and Writing Course. As a student attorney in Hamline's Employment Discrimination Mediation Clinic, Jacqueline successfully mediated and negotiated settlements for employees who had filed discrimination charges with the Equal Employment Opportunity Commission (EEOC) and alleged they were discriminated against because of their age, sex or disability. Jacqueline is licensed to practice law in Minnesota.

Bryce D. Riddle concentrates his practice on complex litigation and commercial class actions in the areas of Sports Law, Data Breach, and Consumer Protection. Currently, Bryce works on the team representing retired NHL players alleging the National Hockey League failed to minimize concussion risks for its players for decades. In data breach litigation, he represents financial institutions in cases against The Home Depot and Wendy's to recover losses arising from breaches that compromised customer financial information. Bryce also works on the Vizio consumer privacy litigation asserting violations of state and federal law for the unauthorized collection and sale of customers' private and personal data.

Bryce graduated cum laude from the University of Minnesota Law School in 2014, where he was a member of the Minnesota Journal of International Law and a Dean's Scholarship recipient. While in law school, he participated in the Student Exchange Program in Milan, Italy at Bocconi University School of Law and also externed for the Honorable David S. Doty of the United States District Court for the District of Minnesota. He subsequently served as a judicial law clerk for the Honorable Elizabeth V. Cutter and the Honorable Bridget A. Sullivan in Minnesota's Fourth Judicial District. Bryce is licensed to practice law in Minnesota and California state courts, as well as federal court in the District of Minnesota.

Christopher P. Ridout is a partner working in the areas of complex litigation including consumer protection, labor and employment, unfair business practices, false advertising, toxic tort, commercial and residential hazardous substance exposure.

He was appointed as co-interim lead counsel representing a class of consumers in a mislabeling lawsuit alleging that Celestial Seasonings tea products falsely claim to be "all natural" when they contain pesticide residue from the agricultural process. In consumer litigation, Chris represents classes of consumers and employees in connection with data breaches that have compromised personal, financial, medical, and employment information. He represents a class of GM diesel truck owners alleging that the DMAX diesel engine design is defective causing a reduction in fuel efficiency by 25-30 percent. He is challenging the billing practices of the Los Angeles Department of Water alleging excessive fees, rates and charges to customers that exceed the costs of provided water and power services. Chris also represents RV owners in a class action lawsuit alleging that Norcold knew of a potentially dangerous RV refrigerator fire risk, but hid that information from the public. He also advocates on behalf of musicians and entertainers in Internet-related copyright and royalty disputes.

Over the last decade, Chris has been involved in the resolution of a series of class action lawsuits including a settlement of more than \$24 million on behalf of misclassified employees, an \$11.5 million settlement for Michigan students loan borrowers over an interest rate dispute, a \$9 million settlement claiming Naked Juice violated state and federal laws regarding the marketing and sale of its product, and a multi-million dollar award for residents of various nursing home facilities alleging widespread and intentional failure to provide sufficient care to the residents due to understaffing.

Chris attended Harvard University where he received his Bachelor of Arts Degree in 1986. While focusing on his major of American History, he was a member of the Harvard Varsity Football Team and played in the historic 100th Harvard-Yale match-up commonly referred to as "The Game." In his senior year, Chris was awarded the "William Payne LeCroix Memorial Award" given to that team member exhibiting the most loyalty and dedication to the Harvard Varsity Football Team.

After graduating from the University of the Pacific McGeorge School of Law in 1989, he was admitted to the California Bar that same year. He has also been admitted to practice before the United States District Court for the Southern, Central, and Northern Districts of California; the United States District Court for the District of Colorado; the United States District Court for the District of Minnesota; the United States District Court for the Northern District of Ohio; and the United States Court of Appeals for the Ninth Circuit.

Hart L. Robinovitch is a partner with Zimmerman Reed, working in the firm's Scottsdale, Arizona office. Hart focuses his practice in the areas of consumer and shareholder actions, and sports law.

Hart currently represents corn farmers and DDGS exporters in the Syngenta Viptera Litigation who have experienced the effects of China's ban of U.S. corn and corn-derived products, suffering lower prices, decreased sales and other losses as the prices of U.S. corn has decreased. He is a member of the lead counsel team representing retired NHL players alleging the National Hockey League minimized the chronic cumulative effects of concussion risks from its players for decades. Hart also represents clients in a class action lawsuit on behalf of RV owners alleging that Norcold knew of a potentially dangerous RV refrigerator fire risk, but hid that information from the public.

Hart has been involved in numerous state and federal court lawsuits around the country challenging the misclassification of entertainers as independent contractors opposed to employees in the nightclub industry. He also represented consumers in other actions alleging deceptive and unlawful business conduct towards customers including, but not limited to, false advertising practices, "bait and switch" tactics, altering contractual terms without valid consideration, and retailers' requests and/or requirements that their customers provide personal identification information when they complete a transaction using their credit card, in violation of state and/or federal statutes. In addition, Hart represented residents of various skilled nursing facilities alleging pervasive and intentional failure to provide sufficient direct nursing care staffing resulting in harm to the residents.

For the past decade, Hart has represented clients in a series of class action lawsuits contesting mortgage lenders' excessive billing and deposits practices for mortgage escrow accounts. Hart

is now involved in numerous federal court lawsuits around the country alleging that mortgage banks and lenders have violated federal and state laws. These cases allege payment of kickbacks and/or illegal and unearned referral fees by the banks and lenders to mortgage brokers who refer mortgage clients who are then charged inflated interest rates on the mortgages. In addition, he represents consumers in other actions contesting the imposition of overcharges and improper fees or other contractual violations in various mortgage transactions. He has worked with co-counsel in state and federal courts across the country.

A native of Canada, Hart earned his degree from the University of Toronto Law School in 1992 where he served as an Associate Editor on the University of Toronto Faculty of Law Review. He received his Bachelor of Science degree in 1989 from the University of Wisconsin-Madison.

Hart is admitted to practice before, and is a member in good standing of, the Bars of the States of Arizona and Minnesota and the United States District Court for the Districts of Arizona, Minnesota, and the Eastern District of Michigan. Hart is also licensed to practice law before the United States Courts of Appeals for the Sixth, Eighth, Ninth, and Eleventh Circuits, and the United States Supreme Court. Hart's memberships include the National Association of Consumer Advocates and Canadian American Bar Association.

J. Gordon Rudd, Jr. is a managing partner at Zimmerman Reed, representing clients in the areas of mass tort, consumer fraud, and employment law. Gordon has been appointed class counsel in cases venued in both state and federal courts across the country.

Gordon was recently part of the team that achieved a \$50 million settlement in the complicated court fight over publicity rights for retired NFL players. In a separate lawsuit, he represents hundreds of retired NFL players suffering from concussive head injuries that occurred while playing in the league. Gordon also represented thousands of individuals injured by the largest release of anhydrous ammonia in U.S. history. Two of those individuals were awarded \$1.2 million by a jury. Eventually, these trials led to a settlement on behalf of other residents of Minot, North Dakota injured by the derailment. Currently, he is representing hundreds of homeowners whose properties have been exposed to a toxic chemical vapor called trichloroethylene (TCE).

In Mass Tort litigation, Gordon leads several cases, including representing clients who experienced uncontrollable urges to gamble while taking top-selling prescription drug Abilify, representing nursing home residents sickened by a Hepatitis C outbreak (the second-largest outbreak of the disease in U.S. History), men who have suffered cardiovascular injuries following their use of testosterone therapy supplements, and clients who experienced severe bleeding problems while taking Xarelto.

Gordon is also working on a number of multi-district litigation cases. Gordon is a member of the lead counsel team representing banks and other financial institutions seeking recovery of losses from the 2013 Target data breach. He also holds leadership positions on several Plaintiffs' Steering Committees including *In re H&R Block IRS Form 8863 Litigation*, MDL 2474, *In re Life Time Fitness, Inc., Telephone Consumer Protection Act (TCPA) Litigation*, MDL 2564, *In re FedEx Ground Package System, Inc.*, MDL 1700, and *In re Building Materials Corp. of America Asphalt Roofing Shingle Products Liability Litigation*, MDL 2283.

Gordon graduated from Connecticut College, where he received a Bachelor of Arts degree in English Literature & Government. He received his law degree from the University of Cincinnati College of Law. Gordon is licensed to practice before, and is a member in good standing of, the Bar of the State of Minnesota and the United States District Court for the District of Minnesota. Gordon is admitted to the United States Court of Appeals for the Eighth Circuit. He has been admitted to appear pro hac vice in cases pending in the states of California, Oregon, Arizona, New Mexico, Texas, North Dakota, Ohio, Florida, Georgia, Tennessee, and Michigan. Since 2006, Gordon has been selected as a Super Lawyer by his peers in Minnesota.

Behdad C. Sadeghi focuses his practice on complex litigation involving consumer protection, securities fraud, and financial fraud in state and federal courts around the country.

Behdad worked on the team representing investors who sustained losses as a result of alleged federal securities law violations by Morgan Keegan and its affiliates that achieved a \$125 million settlement. He also represented a class of financial institutions who suffered losses resulting from a major data breach in a class action against the Target Corporation that resulted in a \$39 million dollar settlement. In consumer litigation, he successfully achieved a multi-million dollar wrongful death settlement against a major automobile manufacturer, and a settlement on behalf of a group of elderly victims of one of the largest hepatitis C outbreaks in the nation's history. He also represents a putative class of consumers alleging violations of the Telephone Consumer Protection Act by Papa Murphy's and SuperAmerica.

Behdad graduated magna *cum laude* from William Mitchell College of Law, where he was a member of the William Mitchell Journal of Law and Practice and the Niagara International Moot Court Team; he also participated in the school's Civil Advocacy Clinic. His academic honors include a CALI Excellence for the Future Award, four Dean's List honors, and a Burton Award Nomination for Excellence in Legal Writing. Behdad is licensed to practice law in Minnesota.

Charles S. Zimmerman is a founding partner at Zimmerman Reed and is a nationally recognized leader in complex and class action litigation. He frequently speaks at industry conferences and CLEs, and is the author of a newly published book on complex litigation. During more than 30 years of practice, Bucky has successfully represented thousands of clients through individual actions and nationwide class actions. His cases have involved the tobacco industry, pharmaceutical companies, and shareholder suits. Bucky has served as lead counsel, PSC member and liaison counsel in numerous major pharmaceutical and medical device cases over the last 15 years. He currently serves on the Lead Counsel Committee for Stryker Hip Litigation, was appointed to the Plaintiffs' Steering Committee in the NFL Players' Concussion Injury Litigation, and is Lead Counsel representing banks in the Target Data Breach case. He has also served as Co-Lead Plaintiffs' Counsel in the Baycol, Guidant, Levaquin, Medtronic, Zicam, NFL Retired Players Publicity Rights, and National Arbitration Forum MDLs. Through his leadership in these and other groundbreaking cases, Bucky continues to advance the interests of his clients and the legal profession.

In addition to his case work, Bucky continues to lecture on complex litigation and working with the media in high profile cases for a variety of organizations including the Minnesota State Bar

Association, Minnesota Continuing Legal Education, the University of Minnesota Law School, William Mitchell College of Law, the Minnesota Association for Justice, and Mealey's Publications. He is also an adjunct professor of law teaching Mass Torts at the University of Minnesota Law School. In 2006, Bucky authored "Pharmaceutical and Medical Device Litigation," a mass tort manual published by Thompson/West.

He has been recognized by his peers in Minnesota as a Super Lawyer from 2000 - 2007, 2011, 2012, 2013, 2014, and 2015. He was also selected as the 2013 & 2014 Minneapolis Mass Tort Litigation / Class Actions - Plaintiffs Lawyer of the Year by The Best Lawyers in America.

Bucky is a graduate of the University of Minnesota Law School. He also received his undergraduate degree from the University of Minnesota and was a three letter winner, Williams Scholar, and captain of the varsity U of M tennis team his junior and senior years. Bucky is a member of the United States Professional Tennis Association obtaining national ranking, and has won gold and silver medals at the world Maccabiah and Pan American Maccabiah games.

Bucky is licensed to practice law in the States of Minnesota and Arizona, and is admitted to the United States District Court for the District of Minnesota, District of Colorado, and District of North Dakota, and the United States Supreme Court. He is also admitted to the Third, Fifth, Sixth, and Eighth United States Circuit Courts of Appeals.

Bucky served as co-chairman of the Advisory Committee for Mealey's Propulsid Litigation Conference and he chaired the faculty of a Minnesota Institute for Legal Education seminar, "Dealing with Complex Litigation." Bucky has also lectured and served as a member of the faculty at Mealey's "Norplant Conference," Mealey's "Breast Implant Conferences," Andrew's Publications' "Medical Devices Litigation Conference," as well as numerous conferences on the subject of Tobacco Litigation and "Youth and Addiction." Additionally, he was a guest lecturer on the subject of Complex Litigation at the University of Minnesota School of Law in conjunction with course work prepared by Professor Robert J. Levy, and the William Mitchell College of Law in conjunction with course work prepared by the Honorable Thomas Carey.

Bucky's memberships include the Minnesota Association for Justice, American Association for Justice, the Federal Bar, the Minnesota State Bar Association, the Hennepin County Bar Association, and the Bar Associations of the Fifth and Eighth Federal District Courts.

CASE RESUME: RECENT LEADERSHIP POSITIONS

Consumer Litigation

- *Adams v. Target Corporation*, United States District Court, Central District of California
- *Chapman v. Sport Chalet*, Superior Court of Los Angeles County, State of California
- *Chavez v. Wal-Mart Stores Inc.*, United States District Court, Central District of California
- *City of Wyoming, et al. v. Procter & Gamble Company, et al.*, United States District Court, District of Minnesota
- *Dearmon, et al. v. Mercury Finance Company*, Fourth Judicial District Court, State of Minnesota
- *DeGrise, et al. v. Ensign Group, Inc., et al.*, Superior Court of Sonoma County, State of California
- *DeLillo, et al. v. NCS Pearson, et al.*, United States District Court, District of Minnesota
- *Diamond, et al. v. AVCO Auto Finance, et al.*, Superior Court of California, Monterey County
- *Drobnak, et al. v. Andersen Windows, Inc.*, United States District Court, District of Minnesota
- *Esparza v. Coach, Inc., et al.*, United States District Court, Central District of California
- *Fischl, et al. v. Direct Merchants Bank*, Fourth Judicial District, State of Minnesota
- *Garcia, et al. v. Metro Gang Strike Force*, United States District Court, District of Minnesota
- *Grant, et al. v. Regions Mortgage Co. f/k/a First Commercial Mortgage Co.*, Superior Court of California, Ventura County
- *Gutter, et al. v. Bank One Louisiana*, Orleans Parish Civil District, State of Louisiana
- *In re Building Materials Corp. of America Asphalt Roofing Shingle Products Liability Litigation*, MDL 2283 (Member of the Plaintiffs' Steering Committee)
- *In re Apple iPhone "MMS" Sales Practices Litigation*, MDL 2116 (Member of the Plaintiffs' Steering Committee)
- *In re Building Materials Corp. of America Asphalt Roofing Shingle Products Liability Litigation*, MDL 2283 (Member of the Plaintiffs' Steering Committee)
- *In re Castano Tobacco Litigation*, United States District Court for the Eastern District of Louisiana
- *In re Dockers Roundtrip Airfare Promotion Sales Practices Litigation*, United States District Court, Central District of California
- *In re Dry Max Pampers Litigation*, United States District Court, Southern District of Ohio
- *In re H&R Block IRS Form 8863 Litigation*, MDL 2474, United States District Court, Western District of Missouri
- *In re Life Time Fitness, Inc., Telephone Consumer Protection Act (TCPA) Litigation*, MDL 2564
- *In re McCormick & Company, Inc. Pepper Products Marketing and Sales Practice Litigation*, MDL 2665
- *In re Medco Health Solutions, Inc., Pharmacy Benefits Management Litigation*, MDL 1508 (Lead Counsel)
- *In re National Arbitration Forum Trade Practices Litigation*, MDL 2122

- *In re Target Corporation Customer Data Security Breach Litigation*, MDL 2522, United States District Court, District of Minnesota
- *In re Uponor, Inc., F1807 Plumbing Fittings Products Liability Litigation*, MDL 2247 (Member of the Plaintiffs' Steering Committee)
- *In re Zurn Pex Plumbing Products Liability Litigation*, MDL 1958 (Liason Counsel)
- *Kurvers, et al. v. National Computer Systems, Inc.*, Fourth Judicial District Court, State of Minnesota
- *Lennartson v. Papa Murphy's Holdings, Inc., et al.*, United States District Court, Western District of Washington
- *McDonald, et al. v. Eli Lilly & Company*, United States District Court, District of Minnesota
- *Mehrens v. Redbox Corp.*, Superior Court of Los Angeles County, State of California
- *Mills, et al., v. Roto-Rooter Services Company*, Fourth Judicial District Court of Hennepin County, State of Minnesota
- *Monteul v. Ensign Group, Inc., et al.*, Superior Court of Los Angeles County, State of California
- *Minnerath, et al. v Zurn Pex Inc.*, United States District Court, District of Minnesota
- *O'Hara, et al. v. Marvin Lumber, et al.*, Fourth Judicial Court, State of Minnesota
- *Pistilli, et al. v. Life Time Fitness*, Fourth Judicial District, State of Minnesota
- *Rapp v. Green Tree Servicing, LLC et al.*, United States District Court, District of Minnesota
- *Rubinstein v. Michaels*, Superior Court of Los Angeles County, State of California
- *Russo, et al. v. NCS Pearson, Inc., et al.*, United States District Court, District of Minnesota
- *Sara Lee Meat Contamination Litigation, Cress v. Sara Lee*, Circuit Court of Cook County, State of Illinois, Court File No. 98 L 15072
- *Scott v. American Tobacco Co., Inc., et al.*, Court File No.: 96-8461, Civil District Court for the Parish of New Orleans, Louisiana
- *Soular v. Northern Tier Energy, LP, et al.*, United States District Court, District of Minnesota
- *U.S. Hotel and Resort Management, Inc. et al. v. Onity Inc.*, United States District Court, District of Minnesota
- *Wallace, et al. v. ConAgra Foods Inc. d/b/a Hebrew National*, United States District Court, District of Minnesota
- *Wick v. Twilio, Inc.*, United States District Court, Western District of Washington
- *Wright, et al. v. Malt-O-Meal Company*, Fourth Judicial District, State of Minnesota

Defective Drugs and Devices

- *Guttormson et al. v. Manor Care of Minot ND, LLC et al.*, United States District Court, District of North Dakota
- *In re Avandia Pharmaceutical Litigation*
- *In re Baycol Products Litigation* MDL 1431 (Co-Lead Counsel)
- *In re Biomet M2A Magnum Hip Implant Products Liability Litigation*, MDL 2391 (Member of the Plaintiffs' Steering Committee)
- *In re Breast Implant Litigation* MDL 926 (Member of the Plaintiffs' Steering Committee)

- *In re Celebrex and Bextra Products Liability Litigation*, MDL 1694 (Member of the Plaintiffs' Steering Committee)
- *In re Darvocet, Darvon And Propoxyphene Products Liability Litigation*, MDL 2226
- *In re DePuy Orthopaedics, Inc., ASR Hip Implant Products Liability Litigation*, MDL 2197
- *In re Diet Drugs Products Liability Litigation (Phentermine / Fenfluramine / Dexfenfluramine)* MDL 1203 (Member of the Plaintiffs' Steering Committee)
- *In re Digitek Products Liability Litigation*, MDL 1968 (Member of the Plaintiffs' Steering Committee)
- *In re Ephedra Products Liability Litigation*, MDL 1598
- *In re Guidant Implantable Defibrillators Products Liability Litigation*, MDL 1708 (Co-Lead Counsel)
- *In re Intergel Products Litigation*, Carver County, Minnesota
- *In re Levaquin Products Liability Litigation*, MDL 1943 (Lead Counsel)
- *In re Meridia Products Liability Litigation*, MDL 1481 (Member of the Plaintiffs' Steering Committee)
- *In re Medtronic Implantable Defibrillators Products Liability Litigation* MDL 1726 (Co-Lead Counsel)
- *In re Medtronic, Inc., Sprint Fidelis Leads Products Liability Litigation* (Co-Lead Counsel)
- *In re Neurontin "Off-Label" Marketing Litigation*, MDL 1629 (Member of the Plaintiffs' Steering Committee)
- *In re Orthopedic Bone Screw Litigation* MDL 1014 (Member of the Plaintiffs' Steering Committee)
- *In re Phenylpropanolamine (PPA) Products Liability Litigation*, MDL 1407
- *In re Propulsid Products Liability Litigation* MDL 1355 (Member of the Plaintiffs' Steering Committee)
- *In re Rezulin Products Liability Litigation*, MDL 1348 (Member of the Plaintiffs' Steering Committee)
- *In re Serzone Products Liability Litigation*, MDL 1477 (Member of the Plaintiffs' Steering Committee)
- *In re St. Jude Silzone Heart Valves Product Liability Litigation*, MDL 1396 (Liason Counsel)
- *In re Stryker Rejuvenate and ABG II Hip Implant Products Liability Litigation*, MDL 2441 (Lead Counsel Committee)
- *In re Sulzer Inter-Op Orthopedic Hip Implant Litigation* MDL 1401 (Member of the Plaintiffs' Steering Committee)
- *In re Telectronics Pacemaker Litigation* MDL 1057 (Member of the Plaintiffs' Steering Committee)
- *In re Viagra Products Liability Litigation*, MDL 1724 (Lead Counsel)
- *In re Vioxx Products Liability Litigation*, MDL 1657 (Member of the Plaintiffs' Steering Committee)
- *In re Zicam Cold Remedy Product Liability Litigation*, MDL 2096 (Lead Counsel)
- *In re Zimmer NexGen Knee Implant Products Liability Litigation*, MDL 2272 (Member of the Plaintiffs' Steering Committee)

Securities, Investment Fraud, Corporate Governance and Antitrust

- *Adedipe, et al. v. U.S. Bank, Nat'l Ass'n, et al.*, United States District Court, District of Minnesota (Co-Lead Counsel)
- *AI Plus, Inc. and IOC Distribution, Inc. v. Petters Group Worldwide, et al.*, United States District Court, District of Minnesota
- *Alessi v. Medicis Pharmaceutical Corp., et al.*, Superior Court of Maricopa County, State of Arizona
- *Apotheker v. Insight Enterprises, Inc., et al.*, Superior Court of Maricopa County, State of Arizona
- *Bamboo Partners v. Apollo Group, Inc., et al.*, United States District Court, District of Arizona
- *Barnett v. Apollo Group, Inc., et al.*, Superior Court of Maricopa County, State of Arizona
- *City of Ann Arbors Employees' Retirement System v. MoneyGram International, Inc.*, United States District Court, District of Minnesota
- *City of Farmington Hills Employees Retirement System v. Wells Fargo Bank, N.A.*, United States District Court, District of Minnesota
- *City of Tallahassee Pension Plan v. Insight Enterprises, Inc., et al.*, Superior Court of Maricopa County, State of Arizona
- *Dillen v. Insight Enterprises, Inc., et al.*, United States District Court, District of Arizona
- *Fry v. Fry*, Fourth Judicial District, State of Minnesota
- *Gaither v. Computer Network Technology Corporation, et al.*, Fourth Judicial District, State of Minnesota
- *Garg v. Virtual Radiologic Corporation, et al.*, Fourth Judicial District, State of Minnesota
- *Haritos, et al. v. American Express Financial Advisors*, U.S. District Court, District of Arizona
- *Hazuka v. Hypercom Corporation, et al.*, United States District Court, District of Arizona
- *In re ATS Medical, Inc. Shareholders Litigation*, Fourth Judicial District, State of Minnesota
- *In re Blue Cross Blue Shield Antitrust Litigation*, MDL 2406
- *In re Boston Scientific Corporation Securities Litigation*, U.S. District Court, District of Massachusetts
- *In re Ditropan XL Antitrust Litigation*, United States District Court, Northern District of California
- *In re Domestic Drywall Antitrust Litigation*, MDL 2437
- *In re E.W. Blanch Holdings Securities Litigation*, United States District Court, District of Minnesota
- *In re LCD Antitrust Litigation*, United States District Court, Northern District of California
- *In re Lipitor Antitrust Litigation*, MDL 2332
- *In re Medtronic, Inc. Derivative Litigation*, United States District Court, District of Minnesota
- *In re Medtronic, Inc. Securities Litigation*, United States District Court, District of Minnesota
- *In re Merrill Lynch & Co., Inc. Securities, Derivative and ERISA Litigation*, United States District Court, Southern District of New York
- *In re Pemstar, Inc. Securities Litigation*, United States District Court, District of Minnesota

- *In re Pool Products Distribution Market Antitrust Litigation*, MDL 2328
- *In re Region Morgan Keegan Securities, Derivative and ERISA Litigation* [*In re Regions Morgan Keegan Open-End Mutual Fund Litigation*], United States District Court, Western District of Tennessee
- *In re Region Morgan Keegan Securities, Derivative and ERISA Litigation* [*Landers v. Morgan Asset Management*], United States District Court, Western District of Tennessee
- *In re St. Jude Medical, Inc. Securities Litigation*, United States District Court, District of Minnesota
- *In re Stellent, Inc. Securities Litigation*, United States District Court, District of Minnesota
- *In re Stratasys Ltd. Shareholder Securities Litigation*, United States District Court, District of Minnesota
- *In re Suboxone Antitrust Litigation*, MDL 2445
- *In re SuperValu, Inc. Securities Litigation*, United States District Court, District of Minnesota
- *In re Target Corporation Securities Litigation*, United States District Court, District of Minnesota
- *In re Taser International Securities Litigation*, United States District Court, District of Arizona
- *In re The St. Paul Companies, Inc., et al.*, United States District Court, District of Minnesota
- *In re Tricor Indirect Purchaser Antitrust Litigation*, United States District Court, District of Delaware
- *In re Vitamins Antitrust Litigation*, United States District Court, District of District of Columbia
- *In re Xcel Energy, Inc. Securities Litigation*, United States District Court, District of Minnesota
- *In re Zomax, Inc. Securities Litigation*, United States District Court, District of Minnesota
- *Klosek, et al. v. Ameriprise Financial, Inc., et al.*, United States District Court, District of Minnesota
- *Krause v. UnitedHealth Group, Inc., et al.*, United States District Court, District of Minnesota
- *Langdale v. Mobility Electronics, Inc., et al.*, United States District Court, District of Arizona
- *Langley v. Syntax-Brilliant Corp., et al.*, United States District Court, District of Arizona
- *Liu v. JDA Software Group, et al.*, Superior Court of Maricopa County, State of Arizona
- *Mars Hill Media v. Petters Group Worldwide, et al.*, United States District Court, District of Minnesota
- *Mok v. Rucker, et al.*, United States District Court, District of Minnesota
- *MoneyGram Payment Systems, Inc. v. Citigroup, Inc., et al.*, Fourth Judicial District, State of Minnesota
- *MoneyGram Payment Systems, Inc. v. Deutsche Bank AG, et al.*, Fourth Judicial District, State of Minnesota
- *New Orleans Employees' Retirement System v. UBS, AG, et al.*, United States District Court, Southern District of New York
- *Reinhardt v. Syntax-Brilliant Corp., et al.*, Superior Court of Maricopa County, State of Arizona
- *Rensch v. Northern Oil & Gas, Inc., et al.*, United States District Court, District of Minnesota

- *Rupp, et al. v. Thompson et al. (Minnesota Corn Processors)*, Fifth Judicial District Court, State of Minnesota
- *Schmidt, et al. v. eFunds Corporation, et al.*, Superior Court of Arizona, Maricopa County
- *Scull v. Compellent Technologies, Inc., et al.*, United States District Court, District of Minnesota
- *St. Barnabas Hospital, Inc., et al. v. Ovation Pharmaceuticals, et al.*, United States District Court, District of Minnesota
- *State of New Mexico v. Visa, Inc., et al.*, First Judicial District, State of New Mexico
- *Stevenson v. ev3 Inc., et al.*, Fourth Judicial District, State of Minnesota
- *Surooj v. Polaris Industries, Inc., United States District Court*, District of Minnesota
- *Tran v. Joly, et al.*, United States District Court, District of Minnesota
- *West, Jr. v. American International Group, Inc., et al.*, United States District Court, Southern District of New York
- *Yurman v. Plato Learning, Inc., et al.*, United States District Court, District of Minnesota

Sports Law

- *Dryer v. National Football League*, United States District Court, District of Minnesota (Lead Counsel)
- *In re National Collegiate Athletic Association Student-Athlete Concussion Litigation*, MDL 2492 (Member of the Executive Committee)
- *In re National Hockey League Players' Concussion Injury Litigation*, MDL 2551 (Co-Lead Counsel)
- *In re National Football League Players' Concussion Injury Litigation*, MDL 2323 (Member of the Plaintiffs' Steering Committee)

Employment Violations – Wage and Hour Litigation

- *Bernstein, et al. v. M.G. Waldbaum, Inc., et al.*, United States District Court, District of Minnesota
- *Christman, et al. v. FPMI Solutions, Inc.*, United States District Court, Northern District of California
- *Daud, et al. v. Gold'n Plump Poultry, Inc.*, United States District Court, District of Minnesota
- *DeKeyser, et al. v. ThyssenKrupp Waupaca, Inc.*, United States District Court, Eastern District of Wisconsin
- *Doe v. Cin-Lan, Inc., et al.*, United States District Court, Eastern District of Michigan
- *Doe I, et al., v. R&B Muskegon, Inc., et al.*, United States District Court, Western District of Michigan
- *Fluegel, et al. v. FedEx Ground Package System, Inc.*, United States District Court, Northern District of Illinois
- *Ford, et al. v. Townsends, Inc.*, United States District Court, Eastern District of Arkansas
- *Frank, et al. v. Gold'n Plump Poultry, Inc.*, United States District Court, District of Minnesota
- *Garner, et al v. Butterball, LLC*, United States District Court, Eastern District of Arkansas

- *Grabman, et al. v. Brakebush Brothers, Inc.*, United States District Court, Eastern District of Wisconsin
- *Griffin, et al. v. FedEx Corporation, et al.*, United States District Court, Northern District of Illinois Eastern Division
- *Helmert, et al. v. Butterball, LLC*, United States District Court, Eastern District of Arkansas
- *Hudson, et al. v. Butterball, LLC*, United States District Court, Western District of Missouri
- *In re Fedex Ground Package System, Inc.*, MDL 1700 (Member of the Plaintiffs' Steering Committee)
- *Larkin et al. v. CPI Corp, et al.*, United States District Court, Western District of Wisconsin
- *Milner, et al. v. Farmers Insurance Exchange*, United States District Court, District of Minnesota
- *Patterson, et al. v. 68-444 Perez, Inc., et al.*, United States District Court, Central District of California
- *Patzke, et al. v. American Express TRS Co., Inc.*, United States District Court, District of Arizona
- *Phelps, et al. v. Green Bay Dressed Beef, LLC*, United States District Court, Eastern District of Wisconsin
- *Robinson, et al. v. Novellus Systems, Inc.*, United States District Court, Northern District of California
- *Salazar, et al. v. Butterball, LLC*, United States District Court, District of Colorado
- *Trauth v. Spearmint Rhino Companies Worldwide, Inc., et al.*, United States District Court, Central District of California
- *Trauth v. Déjà vu Consulting, Inc., et al.*, Superior Court of Los Angeles County, State of California
- *Trejo et al. v. Townsends, Inc.*, United States District Court, Middle District of North Carolina

Environmental and Toxic Torts

- *Adams, et al. v. DPC Enterprises, LP, et al.*, Jefferson County Circuit Court, State of Missouri
- *Cooksey v. Hawkins Chemical Company*, Hennepin County District Court File No. 95-3603
- *Cuff, et al. v. Brenntag North America, Inc., et al.* United States District Court, Northern District of Georgia Atlanta Division
- *Ebert et al. v. General Mills, Inc.*, United States District Court, District of Minnesota
- *Fastrip, Inc., et al. v. CSX Corporation*, United States District Court, Western District of Kentucky
- *In re MTBE Water Contamination Litigation*, MDL 1358, United States District Court, Southern District of New York
- *In re Soo Line Railroad Company Derailment of January 18, 2002 in Minot, N.D.*, Hennepin County District Court File No. 06-1833
- *In re Welding Rods Products Liability Litigation*, MDL 1535, United States District Court, Northern District of Ohio

- *Martin, et al. v. BioLab, Inc., et al.*, United States District Court, Northern District of Georgia Atlanta Division
- *McGruder, et al. v. DPC Enterprises, LP, et al.*, Maricopa County Superior Court, State of Arizona
- *Mehl, et al. v. Canadian Pacific Railway, et al.*, United States District Court, District of North Dakota
- *Ponce, et al. v. Pima County, et al.*, Maricopa County Superior Court, State of Arizona
- *Sanders, et al. v. Norfolk Southern Corporation, et al.*, United States District Court, District of South Carolina
- *Weincke, et al. v. Metropolitan Airports Commission*, State of Minnesota, Hennepin County District Court (Class Counsel)

Homeowner Mortgage Litigation

- *Anderson, et al. v. The Money Store*, United States District Court, District of South Carolina
- *Boschee v. Burnet Title Company*, Fourth Judicial District, State of Minnesota
- *Edwards / White, et al. v. Long Beach Mortgage Company / Washington Mutual Bank F.A., et al.*, Fourth Judicial District Court, State of Minnesota
- *Gewecke v. U.S. Bank, et al.*, United States District Court, District of Minnesota
- *Glover v. Standard Federal Bank*, United States District Court, District of Minnesota
- *Grady v. Burnett Realty*, Fourth Judicial District, State of Minnesota
- *Henry, et al. v. Associate Home Equity Services*, United States Bankruptcy Court, Southern District of California
- *Holland v. Countrywide Home Loans*, Nassau County Supreme Court, State of New York
- *In re Mortgage Escrow Litigation*, MDL 899 (Lead Counsel)
- *Lang v. Town and Country Credit*, United States District Court, District of Minnesota
- *Larpenteur, et al. v. Burnet Realty, Inc., et al.*, Fourth Judicial District, State of Minnesota
- *Logan, et al. v. Norwest Mortgage Bank Minnesota, N.A.*, Fourth Judicial District Court, State of Minnesota
- *Lund v. Universal Title Company*, Fourth Judicial District, State of Minnesota
- *Nobles, et al. v. Countrywide Home Loans*, Alameda County Superior Court, State of California
- *Mahoney v. Fidelity National Title Company*, United States District Court, Central District of California
- *McBride v. Reliastar*, United States District Court, Northern District of Georgia
- *Mitchell, et al. v. Chicago Title Insurance Company*, Fourth Judicial District Court, State of Minnesota
- *Ricci, et al. v. Ameriquest Mortgage Company*, Fourth Judicial District, State of Minnesota
- *Schlink v. Edina Realty Title*, Fourth Judicial District, State of Minnesota
- *Schuetz v. Banc One*, United States District Court, District of Arizona
- *Stepan v. Edina Realty Title*, Fourth Judicial District Court, State of Minnesota
- *Taft v. Wells Fargo Bank N.A.*, Fourth Judicial District, State of Minnesota
- *Wilson v. Commercial Federal Mortgage Corp.*, United States District Court, Northern District of Alabama